

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

GOOGLE INC.

PLAINTIFF

V.

CIVIL ACTION NO. 3:14-CV-981-HTW-LRA

JIM HOOD, in his official capacity  
as Attorney General of the State of  
Mississippi

DEFENDANT

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**DEFENDANT'S NOTICE OF 30(b)(1) DEPOSITION OF VICTORIA GRAND**

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To: Google Inc., by and through its attorneys of record, Fred Krutz and Daniel J. Mulholland, FORMAN WATKINS KRUTZ & TARDY LLP, 200 South Lamar Street, Suite 100, Jackson, Mississippi 39201; David H. Kramer, WISON, SONSINI, GOODRICH & ROSATI, PC, 650 Page Mill Road, Palo Alto, California 94304; Jamie Gorelick, Patrick Carome, Paul Lekas, and Blake Roberts, WILMER CUTLER PICKERING HALE AND DOOR LLP, 1875 Pennsylvania Ave. NW, Washington, DC 20006; and Peter Neiman & Violetta Watson, WILMER CUTLER PICKERING HALE AND DOOR LLP, 7 World Trade Center, 250 Greenwich Street, New York, NY 10007.

PLEASE TAKE NOTICE that Defendant shall take the deposition upon oral examination of Victoria Grand. This deposition will be taken pursuant to Federal Rules of Civil Procedure ("F.R.C.P."), Rule 30(b)(1), and will be recorded by stenographic and/or sound and visual means before an officer authorized by law to administer oaths. The deposition will take place on at a date, time and location set forth below or at another mutually agreed-upon date, time and location and shall continue from day-to-day until completed.

**DEPONENT:** Victoria Grand

**DATE:** September 16, 2015

**TIME:** 9:00 a.m. CDT

**LOCATION:** FORMAN WATKINS KRUTZ & TARDY LLP, 200 South Lamar Street, Suite 100, Jackson, Mississippi 39201

The examining Party gives express prior notice that any objections to the scope of this

examination are deemed waived if relief from the Court is not granted. The examining Party is prepared to meet and confer concerning the scope of this examination, but absent an agreement to the contrary, the examining Party intends to proceed without objection as to the scope unless ordered otherwise by the Court.

### **DOCUMENT REQUEST**

1. All documents relied upon or reviewed when preparing your declaration in this case, or which form the basis of your knowledge in your declaration.

THIS the 17th day of August, 2015.

Respectfully Submitted,

JIM HOOD, in his official capacity as Attorney  
General of the State of Mississippi

By: /s/ John W. Kitchens

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**CERTIFICATE OF SERVICE**

I, John W. Kitchens, one of the attorneys for Defendant Jim Hood, hereby certify that a true and correct copy of the foregoing has been served via electronic mail and United States Mail on the following:

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THIS the 17th Day of June, 2015.

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